

### **REMARKS**

Applicants thank the Examiner for the thorough consideration given the present application. Claims 24-34 are pending in the present application. Claims 24, 26, and 30-32 have been amended. Claims 33 and 34 are new. Claims 24, 31, and 32 are independent claims. The Examiner is respectfully requested to reconsider the outstanding rejection in view of the amendments and the following remarks.

#### ***Claim for Priority***

It is gratefully acknowledged that the Examiner has recognized Applicants' claim for foreign priority. In view of the fact that Applicants' claim for foreign priority has been perfected, no additional action is required from Applicants at this time.

#### ***Drawings***

It is gratefully acknowledged that the Examiner has accepted the Formal Drawings filed on February 2, 2006 for examination purposes.

#### ***Acknowledgment of Information Disclosure Statement***

The Examiner has acknowledged the Information Disclosure Statement filed on February 2, 2006. An initialed copy of the PTO/SB/08 has been received from the Examiner. No further action is necessary at this time.

#### ***Rejection Under 35 U.S.C. § 102***

Claims 24-32 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Eshel et al. (US 5,535,375). This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

Initially, the Examiner is respectfully referred to MPEP § 2131, which sets forth the following:

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. V. Union Oil Co. Of California*, 814 F2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). “The identical invention must be shown in as complete detail as is contained in the ... claims.” *Richardson v. Suzuki Motor Co.*, 868 F2d 1226, 1236, 9 USQP2d 1913, 1920 (Fed. Cir. 1989).

Applicants respectfully submit that Eshel does not set forth each and every element as defined in the claims. Thus, the Examiner’s rejection based on 35 U.S.C. § 102 has been obviated.

Independent claims 24, 31, and 32 are directed toward a network connection system and method which connects an image information apparatus to a network. An example of such a system is described in the present specification as an “ubiquitous image module 12.”

In the rejection, the Examiner relies on Eshel’s host computer 12 for the claimed “image information apparatus” (see Office Action at page 2). Eshel’s invention is directed toward managing files shared by clients exhibiting different protocols, e.g., server message block (SMB) and network file system (NFS). In Eshel, the host computer 12 manages direct access storage devices (DAD’s) for access by clients 14a and 14b (connected via LAN), clients 16 and 18 (connected via TCP/IP network), and a host application running on the host computer.

However, in Eshel, all computers are capable of connecting to the network on their own. As such, Eshel’s invention is not concerned with providing a system/method (e.g., ubiquitous image module) that connects an image information apparatus to a network, as recited in the claims.

Furthermore, independent claim 24 requires the claimed system to be communicatively connected to a host interface of the image information apparatus, and to convert an instruction received from such host interface into a command for a file sharing protocol to be transmitted to another apparatus through a network. Independent claims 31 and 32 similarly require receiving

an instruction from a host interface of the image information apparatus, converting it into an instruction corresponding to the file sharing protocol instruction, and transmitting the converted instruction to another apparatus via the network. Eshel does not teach or suggest such features.

In the rejection, the Examiner relies on the protocol converters 34, 36, 38, and 46 in Eshel for the claimed conversion of an instruction into a file sharing protocol (Office Action at paragraph bridging pp. 2-3). In Eshel, however, none of these protocol converters receive instructions from a host interface of an image information apparatus as claimed. Instead, they either receive instructions from machines configured as clients of the host computer 12, or from an application running internally in the host computer 12. Accordingly, Eshel fails to teach or suggest every claimed feature.

At least for the reasons set forth above, Applicants respectfully submit that independent claims 24, 31, and 32 are in condition for allowance. Accordingly, claims 25-30 are allowable at least by virtue of their dependency on an allowable independent claim. Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

### *Conclusion*

Since the remaining references cited by the Examiner have not been utilized to reject the claims, but to merely show the state of the art, no comment need be made with respect thereto.

In view of the above amendments and remarks, the Examiner is respectfully requested to reconsider the outstanding rejections and issue a Notice of Allowance in the present application.

Should the Examiner believe that any outstanding matters remain in the present application, the Examiner is respectfully requested to contact Jason W. Rhodes (Reg. No. 47,305) at the telephone number of the undersigned to discuss the present application in an effort to expedite prosecution.

Application No. 10/566,731  
Amendment dated September 24, 2009  
Reply to Office Action of June 24, 2009

Docket No.: 0925-0229PUS1

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Dated: September 24, 2009

Respectfully submitted,

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